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September 21, 2016

VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: **Notice of Oral *Ex Parte* Communication**

Terrestrial Use of the 2473-2495 MHz Band for Low-Power Mobile Broadband Networks, IB Docket No. 13-213

Revision of Part 15 of the Commission's Rules to Permit Unlicensed National Information Infrastructure (U-NII) Devices in the 5 GHz Band, ET Docket No. 13-49

Dear Ms. Dortch:

On September 19, 2016, Kevin Robinson of Wi-Fi Alliance and I spoke by telephone with Commissioner Michael O'Rielly and his Legal Advisor Erin McGrath regarding the above-captioned matters. Our counsel, Russell Fox of Mintz Levin, participated in the meeting in person.

We told Commissioner O'Rielly that Wi-Fi Alliance continues to oppose the request by Globalstar, Inc. ("Globalstar") to use the band 2473-2495 MHz for a private, low power terrestrial service. Use of that band will potentially cause harmful interference to Wi-Fi channel 11 and Globalstar has done no industry-standard testing or analysis to demonstrate the contrary. Unlicensed operations in the band 2473-2483.5 MHz are limited in order to protect Globalstar's operations at 2483.5-2495 MHz (where unlicensed use is prohibited). If Globalstar plans to change the nature of its operations, so that protection of its use of the 2483.5-2495 MHz band and associated limited use of the 2473-2483.5 GHz band is no longer required, the Commission should, after further notice and opportunity for comment, consider whether the public interest is better served by opening the full upper segment of the 2.4 GHz band for unlicensed use.

We also expressed our appreciation to Commissioner O'Rielly for his strong support of the potential use of the U-NII-4 band for unlicensed operations. There have been several suggestions how the spectrum can be shared with the dedicated short range

communications service (“DSRC”). We urged that the Commission move quickly in evaluating the information it has received as well as the equipment it has been provided for testing, so that a sharing protocol can be selected and implemented.

Pursuant to Section 1.1206 of the Commission’s rules, an electronic copy of this letter is being filed for inclusion in the above-referenced dockets and provided to Commissioner O’Rielly and Ms. McGrath. Please direct any questions regarding this filing to the undersigned.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Edgar Figueroa", with a stylized flourish at the end.

WI-FI ALLIANCE

Edgar Figueroa
President and CEO

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cc: Hon. Michael O’Rielly
Erin McGrath